

IN THE SUPREME COURT OF FLORIDA
BEFORE THE FLORIDA JUDICIAL QUALIFICATIONS COMMISSION

SC13-1333

INQUIRY CONCERNING A JUDGE No. 12-613

LAURA M. WATSON

**Judge Watson's Response in Opposition to Motion of the Florida Bar, Henry
Coxe, III, and Ghenete Wright Muir for Extension of Time to Respond**

to:

**Judge Watson's Notice of Direct Criminal Contempt by The Florida Bar and
Judicial Qualifications Commission (Coxe, McGrane, and Muir)**

-and-

**Motion to Reject the Report and Recommendations of the JQC Based Upon
Perjury, Fraud, Spoliation of Evidence, and Numerous Violations of the Rules
Regulating The Florida Bar, and Other Related Relief**

The Honorable Laura M. Watson (hereinafter "Judge Watson") by and
through her undersigned counsel, hereby responds in opposition to the Motion of
the Florida Bar, Henry Coxe, III, and Ghenete Wright Muir for Extension of Time
to Respond to Judge Watson's Notice of Direct Criminal Attempt and Motion to
Reject the JQC's Report and Recommendations (hereinafter "Motion for Extension
of Time")¹.

¹ Hereinafter, Judge Watson's Judge Watson's Notice of Direct Criminal Contempt
by The Florida Bar and Judicial Qualifications Commission (Coxe, McGrane, and
Muir) -and- Motion to Reject the Report and Recommendations of the JQC Based
Upon Perjury, Fraud, Spoliation of Evidence, and Numerous Violations of the
Rules Regulating The Florida Bar, and Other Related Relief will be simply referred

**The Florida Bar is Neither a Party to these Proceedings
Nor the Subject of Judge Watson's Notice of Direct Criminal Contempt**

The Florida Bar (hereinafter “TFB” or “Bar”), is neither a party to these proceedings, as detailed *infra*, nor the subject of Judge Watson’s Notice of Direct Criminal Contempt.

TFB is *not* the subject of Judge Watson’s Notice of Direct Criminal Attempt. Although, due to a scrivener’s error, the title of Judge Watson’s Notice of Direct Criminal Contempt states the Florida Bar instead of the “the Florida Bar’s Counsel”, the first paragraph and body of the Notice clearly reflect that it is directed at The Florida Bar’s counsel, Henry Coxe, III, (hereinafter “Coxe”), and Ghenete Wright Muir (hereinafter “Muir”)², and not The Florida Bar itself. Therefore, TFB has no standing to respond to Judge Watson’s Notice of Direct Criminal Contempt.

Furthermore, Judge Watson’s sought relief, which includes the imposition of costs, jointly and severally on TFB and JQC, of an expert to perform an IT examination does not make TFB a party to this proceeding. Under the Inherent Powers, a court may impose sanctions on third parties. *See Chambers v. Nasco*, 501 U.S. 32, 41, 111 S. Ct. 2123, 2131, 115 L. Ed. 27, 42 (1991) (Affirming

to individually as “Notice of Direct Criminal Contempt” and “Motion to Reject the JQC’s Report and Recommendations”.

² As detailed *infra*, TFB’s counsel’s (Coxe and Muir) desired response to Judge Watson’s Notice of Direct Criminal is premature.

imposition of sanctions “on other individuals, who were not parties to the action”). To the extent that TFB’s counsel have failed in their duties to preserve and provide to Judge Watson emails responsive to her discovery requests, and/or public records requests, TFB should bear in the costs to remedy those failures.

Therefore, TFB is not subject to Judge Watson’s Notice of Direct Criminal Contempt, and this Honorable Court should deny TFB’s Motion for Extension of Time.

As third parties, TFB, Coxe, and Muir Have No Standing to Respond to Judge Watson’s Motion to Reject the JQC’s Report and Recommendations

As third parties to these proceedings, TFB, Coxe, and Muir have no standing to respond to Judge Watson’s Motion to Reject the JQC’s Report and Recommendations.

Only parties have the right to respond to a Florida appellate motion. Fla. R. App. P. 9.300(a) provides in pertinent part that “a **party** may serve 1 response to a motion within 10 days of service of the motion.” (Emphasis added.) Since Judge Watson successfully defeated TFB’s prior intervention attempts, and TFB, Coxe, and Muir are not parties to these proceedings, they have no standing or right to respond to her Motion to Reject the JQC’s Report and Recommendations.

Therefore, TFB, Coxe, and Muir are not parties and have no right to respond to the subject motion, and this Honorable Court should deny these non-parties’ Motion for Extension of Time.

The Non-Parties' Motion for Extension of Time is Untimely

The non-parties' Motion for Extension of Time is untimely. It was filed after the expiration of the time to respond, and therefore should be stricken and/or denied.

The non-parties' Motion for Extension of time was filed on March 25, 2015, which was after the expiration of the time to respond. Judge Watson's Notice of Direct Criminal Contempt and Motion to Reject the JQC's Report and Recommendations was filed on March 11, 2015, and the Appendix thereto was filed on March 14, 2015. Fla. R. App. P. 9.300(a) provides in pertinent part that "a party may serve 1 response to a motion within 10 days of service of the motion." As explained by The Honorable Philip J. Padovano, motions for extensions of time:

must be filed before the expiration of the period of time sought to be extended. To that extent, the time period in issue also serves as a practical limitation on the time for filing the motion for extension.

Philip J. Padovano, *Florida Appellate Practice*, § 13.2 (2011-2012 ed.). *See also* Kobel v. Schosser, M.D., 601 So. 2d 601, 603 (Fla. 4th DCA 1992) (Requiring "that motions for additional time to do something required or permitted by the rules, filed after the expiration of the original period, show some good reason why timely application was not sought"); Hale v. Shear Express, Inc., 946 So. 2d 94, 96 (Fla. 1st DCA 2006) (Striking untimely response to motion for additional attorneys'

fees). *Assuming arguendo* that TFB, Coxe, and/or Muir were parties to these proceedings, and had a right to respond to Judge Watson's Motion to Reject the JQC's Report and Recommendations, they had to respond or move for an enlargement of time to respond by Tuesday, March 24, 2015³, but they did not move for an extension of time until March 25, 2015, which was after such period expired, and have not pled any good reason why timely application was not sought.

Therefore, the non-parties' Motion for Extension of Time was untimely and should be stricken and/or denied.

**Coxe and Muir's Desired Response to
Judge Watson's Notice of Direct Criminal Contempt is Premature**

As detailed in the undersigned's correspondence attached to the Movant's Motion for Extension of Time, Coxe and Muir's desired response to Judge Watson's Notice of Direct Criminal Contempt against them is premature until this Honorable Court issues a show cause order directed to Coxe or Muir.

This Honorable Court has not issued a show cause order, and until such time, it is premature for Coxe or Muir to respond to Judge Watson's Notice of Direct Criminal Contempt. Fla. R. Crim. P. 3.830 provides in pertinent part:

Prior to the adjudication of guilt the judge shall inform the defendant of the accusation against the defendant and inquire as to whether the

³ They had to respond or move for an extension of time to respond within ten (10) days of service of Judge Watson's Motion to Reject the JQC's Report of Recommendations, but since Judge Watson's Appendix thereto was not served until March 14, 2015, we are calculating the ten (10) days from that date.

defendant has any cause to show why he or she should not be adjudged guilty of contempt by the court and sentenced therefor. The defendant shall be given the opportunity to present evidence of excusing or mitigating circumstances.

While Judge Watson has put this Court on notice of acts of direct criminal contempt by Coxe and Muir, this Court has not “informed the defendant[s] of the accusation of criminal contempt” and issued a show cause order “why he or she should not be adjudged guilty of contempt”. Searcy v. State, 971 So.2d 1008, 1014 (Fla. 3d DCA 2008). Pursuant to such rule and the authority on criminal contempt, the Florida Supreme Court must *first* issue a show cause order before allowing Coxe and Muir an opportunity to respond and present evidence that the underlying conduct in question is not contemptuous. Id.

Therefore, Coxe and Muir’s desired response to Judge Watson’s Notice of Direct Criminal Contempt is premature, and this Honorable Court should deny their Motion for Extension of Time.

The Movants’ Opposition to the Appointment of an Independent and Neutral IT Expert to Examine Their Records and Identify the Documents Responsive to Judge Watson’s Outstanding Discovery and Public Records Requests Is Contrary to Their Earlier Representations, Actions, and/or Duties

The Movants opposition to the appointment of an independent and neutral IT expert to examine their records and identify the documents responsive to Judge Watson’s outstanding discovery and public records requests is contrary to their earlier representations, actions, and/or duties pursuant to Florida’s Rules of Civil

Procedure, numerous Bar Rules, and/or AOSC10-17⁴.

As detailed in Judge Watson's Notice of Direct Contempt and Motion to Reject the JQC's Report and Recommendation, it has been revealed that contrary to TFB's duties, it failed to properly preserve and produce many emails and/or other documents responsive to Judge Watson's discovery and public records requests. *In fact, not only* has Judge Watson uncovered many emails that should have been produced to her in response to her discovery and/or public records requests, *but also* Muir's August 12, 2014 own deposition testimony reveals that all of the relevant emails in Judge Watson's and other parallel bar cases "were not saved as they should have been":

"Well, everything is not in a file. It's in our database."...

...that everything should have been in the Kane file, but this is a case that's pretty unique that we have for the respondents. Some could be in the other four respondents' files. So, unfortunately, it could have been saved somewhere else. And then some may not have made it to the database...This [is] the first time since I've been at the bar that we've had to ask IT to help us. This is the most documented case that I've had. Probably in the top 10, maybe, at the present for my office. It is a lot of paperwork. Which is really a lot of data. So everything should have gone into the Kane and Kane file if it had anything to do with the Kane and Kane case. But, like I said, some could have gone into one of the other four respondents and some maybe were not saved at all...Unfortunately, they were not saved the way they should be and they all should have been in the file...

...My sense—my sense—I can't tell you definitely, but being in the

⁴ Hereinafter, Florida Supreme Court's Administrative Order AOSC10-17 will be referred to as AOSC10-17.

office and knowing what should occur, it didn't seem that everything occurred. Meaning, everything regarding the Kane[s] should have gone in the Kane[s]. These are electronic files. So this case could easily have 10,000—I mean, thousands of documents. So, some of them may have, instead of going to the Kane[s], gone into Marks, gone into Fleischer, gone into Lentner, gone into Watson. [There are] four other respondents. So, obviously, we didn't capture all of the things that came in. So, I can't tell you exactly, 'Scott, this is what happened. This email went here. This email went there.' But I can tell you they should have been all in the database and, unfortunately, they weren't.

(App. Ex. B to Notice of Direct Criminal Contempt, Muir Deposition pp. 52-55)

After uncovering the Improperly Withheld Emails, which are defined and detailed in the subject Notice and Motion, Robert A. Sweetapple, Esq. (hereinafter “Sweetapple”) contacted Coxe, on January 23, 2015, about this “disturbing” failure to produce these emails, which were responsive to his discovery requests, and requested to be advised “of all responsive emails that were withheld by the Bar” and the Bar’s intended remedial actions (Resp. App. Ex. A – Sweetapple’s correspondence without the attachments). On February 3, 2015, Coxe on behalf of TFB responded: “Bob—on top of this. Will get back to you soon. Hank Coxe.” (Resp. App. Ex. B). However, nearly two (2) months later, Coxe has still not provided any additional materials to Judge Watson’s counsel.

On February 17, 2015, Coxe filed a Notice of Additional Materials Subject to Subpoena in this Court, which stated in pertinent parts:

4. Counsel for The Florida Bar has subsequently determined that additional materials had been in the possession of The Florida Bar which had not been provided pursuant to Respondent’s Subpoena.

5. Counsel for The Florida Bar is in the process of immediately identifying and providing these additional materials to counsel for the Respondent.

However, over a month later, Coxe has still not provided any additional materials to Judge Watson's counsel.

Despite TFB's opposition to the appointment of an *independent* and *neutral* IT, TFB hired an *alleged* national IT expert Jill C. Griset, Esq.⁵ (hereinafter "Griset") to assist it in responding to Judge Watson's discovery and public records requests, as reflected by her February 25, 2015 correspondence to Sweetapple (hereinafter "Introduction Letter"), which states in pertinent parts:

I'm writing on behalf of The Florida Bar ("the Bar"). We have been asked to assist the Bar in responding to your letter to Henry Coxe dated January 23, 2015. Specifically, McGuireWoods is assisting the Bar in performing additional searches to determine whether there are any documents not previously produced that are potentially responsive to the Subpoena Duces Tecum issued to Ghenete Wright Muir dated November 12, 2013 ("the Subpoena"). McGuireWoods is also assisting the Bar with responding to your Public Records Request dated January 9, 2015...

...The Bar will produce all non-privileged/non-protected documents that are responsive to the Subpoena that were not previously produced, if any are found as a result of the above searches...

...Finally, the Bar is collecting all documents from the following case

⁵ While Coxe indicates in the article cited *infra* that TFB hired a national IT expert, and Griset's illuminating article discussed *infra* has been nationally published, we are not able to concede whether she *is in fact* an IT expert until we have conducted discovery on this issue. *Assuming arguendo* that Griset is an IT expert, as detailed *infra*, she is not *independent and neutral*.

files in CAMFI: Gary Marks; Amy [sic] Fleischer; Charles Kane; Harley Kane and Daris [sic] Lentner. We will review those files to see if any are responsive to the public records request as well. To the extent that we find any nonprivileged/non-confidential documents responsive to the Subpoena during our searches related to the public records request, we will produce those documents as well...

(Resp. App. Ex. C p. 1-3). However, Griset is not independent, and her own representations detailed *infra* reveal her to be anything but neutral. Over a month later, neither Coxe nor Griset have provided any additional materials to Judge Watson's counsel.

Recently, on March 11, 2015, as reflected in the attached article published by Law360, "Fla. Judge Accuses Attys of Contempt in Disciplinary Case", Coxe acknowledged the hiring of a national IT expert to assist:

Coxe said Wednesday that he filed notice with the Supreme Court when Judge Watson's counsel, Robert A. Sweetapple of Sweetapple Broeker & Varkas PL, claimed to him he had not received certain materials he should have. Coxe said he assured Sweetapple and the court he would expeditiously find out what the true circumstances were and offered the other side a national IT expert to assist.

(Resp. App. Ex. D p. 3) (Emphasis added.)

Now, contrary to TFB's aforementioned representations, actions, and/or duties, the Movants oppose Judge Watson's sought relief, including the appointment of an *independent and neutral IT expert* to examine their records and identify the documents responsive to Judge Watson's discovery and public records requests, but, as detailed *infra*, the necessity for such appointment is revealed by

the representations of TFB's own *alleged* IT expert's, Griset, representations.

TFB's Own *Alleged* IT Expert's, Griset, Representations Demonstrate the Necessity for the Appointment of an *Independent and Neutral IT Expert*

TFB's own *alleged* IT expert's, Griset, representations demonstrate the necessity for the appointment of an *independent and neutral IT expert*.

While Griset is purportedly a nationally recognized IT expert in the area of e-forensics, she is not independent, and her representations in her Introduction Letter reveal she is not neutral, and demonstrate the need for the appointment of an *independent and neutral IT expert*. Griset's Introduction Letter, which details her firm's assistance to the Bar in performing additional searches for documents, which were improperly withheld, exposes: 1) TFB's seemingly insincere attempt to search for and identify the relevant Improperly Withheld Emails; 2) does not address the manner in which the thousands of misfiled and/or deleted emails will be identified; and 3) confirms the need for this Honorable Court to appoint an *independent and neutral IT expert* paid for jointly and severally by TFB and JQC.

Griset's Introduction Letter states in pertinent part:

Specifically, the Bar is in the process of running the search term "Watson" across the following sources: (1) the e-mail accounts of Adria Quintela, Alan, Pascal, Ghenete Wright Muir, Kenneth Marvin and Emily Sanchez ("key custodians"); and (2) each of the "key custodians" data on their local hard drives and network drives. In addition, it is reviewing any hard copy records that may exist to ensure that no documents were overlooked. Also, the Bar stores documents by matter name in its CAMFI system and it has a case file

in CAMFI for Laura Watson.⁶

(Resp. App. Ex. C p. 1). However, Griset's *own* choice of search terms and key custodians raises serious concerns that 1) TFB's own *alleged* IT expert failed to meet her obligation to sufficiently understand the facts relevant to Judge Watson's case so that she could determine what data is relevant, and where the data related to those facts may be located; or 2) Griset was not making a good faith attempt to find the relevant information. As stated in Griset's 2012 "Navigating A Case Through E-discovery" article, "counsel has an affirmative duty to acquire a basic (and accurate) understanding of (1) how and where the *client and/or its representatives store documents*, (2) how to retrieve data from those sources; (3) the client's document retention and destruction practices and policies; and (4) *the person or persons most likely to have information relevant to the litigation*. See, e.g., *Zubulake v. UBS Warburg LLC*, 229 F.R.D. 422, 432 (S.D.N.Y. 2004)" (other internal citations omitted). (Resp. App. E p. 3) (Emphasis added.)

As demonstrated in Judge Watson's Notice of Direct Criminal Contempt and Motion to Reject the JQC's Report and Recommendations, *the person or persons most likely to have information relevant to the litigation* are not those "key custodians" identified by Griset. Rather, some of the most incriminating emails we

⁶ Muir's aforementioned deposition testimony reveals that TFB did not preserve the relevant documents according to Griset's representations.

have uncovered were exchanged between Larry Stewart, Esq. (hereinafter “Stewart”) and/ or William C. Hearon, Esq. (hereinafter “Hearon”), and outside vendors not employed by the local Broward Office of TFB (such as David Rothman, Esq. (hereinafter “Rothman”)); or emails exchanged between Stewart/Hearon and those that were part of the Bar’s organizational structure (such as a member of the Board of Governors), but who used their private email accounts to communicate with Stewart/Hearon. Those email addresses are not controlled by the Florida courts, and searching TFB’s data would not necessarily identify these documents.⁷ The use of private email accounts for official business, as demonstrated by reports of former Secretary of State Hillary Clinton and former Florida Governor Jeb Bush use of such accounts for such purposes, gives rise to serious concerns about security, transparency, and/or preservation of emails exchanged between those individuals.

However, Griset’s Introduction Letter makes no mention of any attempts to

⁷ Such communications were sent to: John J. White, Esq. (President of TFB in 2008 who then became a member of the JQC and served on Judge Watson’s JQC Investigative Panel in 2013); Eugene Pettis, Esq. (President of TFB in 2013); Greg Coleman, Esq. (President-elect of TFB in 2013); John F. Harkness, Esq. (Executive Director of the Florida Bar); John T. Berry, Esq. (Legal Division Director of The Florida Bar); Ken Marvin, Esq. (Chief Discipline Counsel of The Florida Bar); Jay Cohen, Esq.; Adele Stone, Esq.; Rothman; and Jeanne Melendez, Esq. (“Melendez”) (Rothman and Melendez are Special Counsel hired by TFB to prosecute the other PIP lawyers). For example, Rothman and Melendez’s email account addresses are dbr@rothmanlawyers.com and jtm@rothmanlawyers.com, and Miles A. McGrane, III’s is miles@mcgranelaw.com.

search the computers of the aforementioned outside vendors or individuals who used their private email accounts to communicate with Stewart and Hearon. Such an omission from this *allegedly* nationally recognized IT expert, hired by TFB, is disconcerting to say the least and/or demonstrative of bias. Either Griset failed to adhere to her ethical duty to acquire a “basic (and accurate) understanding” of the case, or 2) she has ignored her duty to be transparent and cooperative (Resp. App. E p. 3) As set forth in Griset’s aforementioned article, litigators in this area are required to be “[w]ell [p]repared, [t]ransparent, and [c]ooperative... In fact, counsel are finding more battles (both in and out of the courtroom) are won through cooperation and transparency. *See e. g., Mancia v. Mayflower Textile Servs. Co.*, 2008 U.S. LEXIS at 13 (D. Md. 2008)(compliance with the ‘spirit and purposes’ of discovery rules ‘requires cooperation rather than contrariety, communication rather than confrontation.’).” (Resp. App. E p. 7) (Emphasis omitted.)

TFB’s decision to run the search term “Watson” across the e-mail accounts of random Bar employees designated as “key custodians” (Adria Quintela, Alan Pascal, Ghenete Wright Muir, Kenneth Marvin and Emily Sanchez) suggests that TFB 1) has no intention of immediately identifying and providing these additional materials to Judge Watson’s counsel; 2) has no intention of attempting to identify the thousands of emails that were misfiled or destroyed; and/or 3) has no electronic

record keeping system for the organized collection, processing, transmission, and dissemination of information in accordance with defined procedures, and/or those procedures were not followed in this case. Thus, it is difficult to imagine a case more in need of an appointment of an *independent and neutral IT expert* than this one.

Conclusion

Due to the issuance of AOSC10-17, and the general nature of Bar proceedings, of which it is reasonably foreseen results in litigation, TFB was on notice that it had duties to preserve records pertinent to Judge Watson and the other lawyers subject to related, but separate Bar proceedings, which records would be responsive to Judge Watson's discovery and public records requests.

Based upon the testimony of Muir that thousands of emails may have been misfiled, lost, and/or deleted, and Coxe's and/or TFB's own *alleged* IT expert's, Griset, representations regarding their efforts to identify and produce additional discovery materials that were admittedly not produced by TFB to Judge Watson, Judge Watson has shown good cause for the appointment of an *independent and neutral expert*, paid for by in part by TFB. See Menke v. Broward County School Board, 916 So.2d 8 (Fla. 4th DCA 2005).

Judge Watson's Request for Relief

WHEREFORE, Judge Watson respectfully requests that this Honorable

Court enter an order striking and/or denying the Movants' Motion for an Extension of Time, awarding Judge Watson her attorneys' fees and costs for responding to the subject motion, and enter other relief as this Court deems appropriate.

Respectfully submitted,

By: s/Colleen Kathryn O'Loughlin
Florida Bar No. 0042528
COLLEEN KATHRYN O'LOUGHLIN
COLLEEN KATHRYN O'LOUGHLIN, P.A.
1201 N. Federal Hwy #4493
Fort Lauderdale, Florida 33338
colleen@colleenoloughlin.com
(954) 467-5505

Co-counsel for Respondent, The Honorable Laura
M. Watson

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via the E-Filing Portal on this 1st day of April, 2015 to: The Honorable Laura M. Watson, 17th Judicial Circuit, 201 S.E. 6th Street, Room 1005B, Fort Lauderdale, Florida 33301 (Email: jwatson@17th.flcourts.org; ltucker@17th.flcourts.org); Robert A. Sweetapple, Esquire, Sweetapple, Brocker & Varkas, P.I., 20 SE 3rd Street, Boca Raton, Florida 33432 (Email: pleadings@sweetapplelaw.com); Jay S. Spechler, Esquire, Museum Plaza, Suite 900, 200 S. Andrews Ave, Fort Lauderdale, Florida 33301-1964 (Email: jay@jayspechler.com); (Marvin E. Barkin, Esquire, and Lansing C. Scriven,

Esquire, Special Counsel for the JQC, Trenam, Kemker, Scharf, Barkin, Frye, O'Neill & Mullis, P.A. 101 East Kennedy Boulevard, Suite 2700, Tampa, Florida 33602 (Email: mbarkin@trenam.com; lscriven@trenam.com); Henry M. Coxe, III, Esquire, Bedell, Dittmar, DeVault, Pillans & Coxe, P.A. Attorney for Florida Bar, 101 East Adams Street, Jacksonville, Florida 32202 (Telephone: 904-353-0211; E-Mail:hmc@bedellfirm.com); Lauri Waldman Ross, Esquire, Counsel to the Hearing Panel of the JQC, Ross & Girtten, 9130 South Dadeland Boulevard, Suite 1612, Miami, Florida 33156 (Email: RossGirtten@Laurilaw.com, Susie@Laurilaw.com); Michael L. Schneider, Esquire, General Counsel to the JQC, 1110 Thomasville Road, Tallahassee, Florida 32303 (Email: mschneider@floridajqc.com); David B. Rothman, Esquire, Rothman & Associates, P.A., Special Counsel to the Florida Bar, 200 S. Biscayne Blvd, Suite 2770, Miami, Florida 33313 (Email: dbr@rothmanlawyers.com); Ghenete Wright Muir, Esquire, Bar Counsel, The Florida Bar, 1300 Concord Terrace, Suite 130, Sunrise, Florida 33323 (Email: gwrightmuir@flabar.org); Alan Anthony Pascal, Esquire, Bar Counsel, The Florida Bar, 1300 Concord Terrace, Suite 130, Sunrise, Florida 33323 (Email: apascal@flabar.org); Adria Quintela, Esquire, Staff Counsel The Florida Bar, 1300 Concord Terrace, Suite 130, Sunrise, Florida 33323 (Email: aquintela@flabar.org).

Pursuant to FJQCR Rule 10(b) a copy is furnished by e-mail to: The Honorable Kerry I. Evander, Chair of the JQC, 300 S. Beach Street, Daytona Beach, Florida 32114 (Email: evanderk@flcourts.org).

By: s/Colleen Kathryn O'Loughlin
Florida Bar No. 0042528